

1 Stephen M. Doniger (SBN 179314)
stephen@donigerlawfirm.com
2 Scott A. Burroughs (SBN 235718)
scott@donigerlawfirm.com
3 Trevor W. Barrett (SBN 287174)
tbarrett@donigerlawfirm.com
4 Justin M. Gomes (SBN 301793)
jgomes@donigerlawfirm.com
5 DONIGER / BURROUGHS
6 603 Rose Avenue
7 Venice, California 90291
8 Telephone: (310) 590-1820
9 Attorneys for Plaintiff

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 WONGAB CORPORATION,
13
14 Plaintiff,

15
16 v.

17
18 TARGET CORPORATION; et al.,
19
20 Defendants.

Case No. 2:18-cv-02625-JAK-AS
Hon. John A. Kronstadt Presiding

**JOINT REPORT RE REVISED
TERM CONSTRUCTION**

By and through their attorneys of record, who are set forth below, the parties – Plaintiff Corporation (“Wongab”) and Defendant Target Corporation (“Target” collectively with Wongab, the “Parties”) – hereby submit this jointly signed revised term construction for the term “ground organization.”

Claim(s)	Term or Phrase	Construed Meaning	Specification Support
1, 5, 6, 7	“ground organization”	The structure of the underlying knitted fabric.	

Dated: December 14, 2018

By: /s/ Scott A. Burroughs
 Scott A. Burroughs, Esq.
 Trevor W. Barrett, Esq.
 DONIGER /BURROUGHS
 Attorneys for Plaintiff

Dated: December 14, 2018

By: /s/ Willmore F. Holbrow III
 Willmore F. Holbrow III, Esq.
 Matthew L. Seror, Esq.
 BUCHALTER
 A Professional Corporation
 Attorneys for Defendant
 TARGET CORPORATION

Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing’s content and have authorized the filing.